

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Chenell Nyree Ragin fka Chenell Joseph dba
Ragin's Corporate Cleaning**

Debtor(s)

BANK OF AMERICA, N.A.

Movant

vs.

**Chenell Nyree Ragin fka Chenell Joseph dba Ragin's
Corporate Cleaning**

Respondent(s)

BK NO. 18-03570 JJT

Chapter 13

Hearing Date: 11/06/18

**OBJECTION OF BANK OF AMERICA, N.A.
TO CONFIRMATION OF CHAPTER 13 PLAN**

BANK OF AMERICA, N.A. (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. Secured Creditor is in the process of filing a Proof of Claim by the claims bar date of November 6, 2018 which will set forth an estimated pre-petition arrearage total of \$62,509.67.
2. Debtor's Plan provides for payment in the amount of \$54,000.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$8,509.67, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, BANK OF AMERICA, N.A., prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: October 30, 2018

By: /s/ James C. Warmbrodt, Esquire
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